

U.S. EXHIBIT C

DECLARATION OF JANICE GOO

I, Janice Goo, do hereby declare:

1. I am employed by the Department of the Air Force, 15th Civil Engineer Squadron, Hickam Air Force Base, Hawaii.
2. My duties include monitoring and maintaining the real property facility records for the installations under the command of the 15th Airlift Wing. Installations under the control of 15th Airlift Wing are: Hickam Air Force Base, Bellows Air Force Station, Hickam Petroleum Products Storage Annex, Johnston Atoll Airfield, Kaala Air Force Station, Kokee Air Force Station, Punamano Air Force Station, Wahiawa Communications Station, Wheeler Administrative Annex, Schofield Firing Range, and Wake Island Airfield.
3. On behalf of the Air Force, 15th Civil Engineer Squadron at Hickam AFB, I am responsible for making inquiries and conducting the search for information responsive to Plaintiffs' First Requests for Production ("Discovery Request") in the case of Byington, et al. v. United States of America, United States District Court for the District of Hawaii, Case No. CV04 00661.
4. I have been provided with the Discovery Request and have reviewed it. I have also received information and guidance from base legal counsel. I have made inquiries in my unit as to where documents responsive to Plaintiffs' Discovery Request might be located. These inquiries include contacting Mr. Ron Lanier and Mr. Henry Rimas, 15th Civil Engineer Squadron, Environmental Flight, and Mr. Anthony Choy, Hawaii Air National Guard Real Property Officer, and Capt Ian Beltran, Hawaii Air National Guard, Environmental Office, to see if they had copies of the environmental documents requested. Based on these inquiries and upon

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my personal experience within 15th Civil Engineer Squadron, Real Estate Element, and in this career field, I have concluded that responsive documents within my office's possession, custody, or control would be maintained in the real estate and environmental records, located at 75 H Street, Hickam Air Force Base, Hawaii. I personally reviewed these files and located several documents therein that are responsive to Plaintiff's Discovery Request. These documents are identified as follows:

- a. Attachment 5 to the Environmental Baseline Survey Report for Hickam AFB License Modification for Facility Realignment for 203 ARB and 204 AS, dated 30 January 1995, listed as "Asbestos Abatement";
- b. Environmental Compliance Assessment and Management Program (ECAMP) Report, dated October 1993;
- c. ECAMP report, dated August 1992;
- d. Hawaii Air National Guard Asbestos Management Plan and Survey, dated January 1992.
- e. Environmental Baseline Survey Report for 203 ARS Facilities, Hickam AFB, dated November 1993;

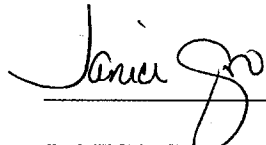
5. True and correct copies of all of the documents listed above, as they are kept in my office or in the environmental's files, have previously been provided to the Office of the Staff Judge Advocate, 15th Airlift Wing, Hickam Air Force Base, Hawaii.

6. Despite my specific inquiries and search efforts, one document sought in the Discovery Request could not be located. The document that could not be located is the 15 CES/DEV Historical Environmental Reports, dated November 1993.

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Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on this 7th day of February 2006, at Hickam Air Force Base, Hawaii.



JANICE GOO

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DECLARATION OF EDWARD LAFERTY

I, **Major Edward Laferty**, do hereby declare:

1. I am a MILITARY MEMBER WITH THE UNITED STATES AIR FORCE. Stationed with the 15 ADS/SGGB at Hickam AFB, HI.
2. My duties include am a Bioenvironmental Engineer whose office has the responsibility of monitoring the health conditions of government employees on Hickam AFB, HI. Therefore we keep the records of all air or bulk environmental sampling we complete.
3. On behalf of the Air Force, I am responsible for making inquiries and conducting the search for information responsive to Plaintiffs' First Requests for Production ("Discovery Request") in the case of Byington, et al. v. United States of America, United States District Court for the District of Hawaii, Case No. CV04 00661.
4. I have been provided with the Discovery Request and have reviewed it. I have also received information and guidance from base legal counsel. I have made inquiries in my unit as to where documents responsive to Plaintiffs' Discovery Request might be located. These inquiries include the records located in the Bioenvironmental Engineering Office. Based on these inquiries and upon my personal experience within 15 ADS/SGGB and in this career field, I have concluded that responsive documents within my office's possession, custody, or control would be maintained in the Bioenvironmental Engineering office, building 2070 on Hickam AFB, HI. I personally reviewed these files and located several documents therein that are responsive to Plaintiff's Discovery Request. These documents are identified as follows:

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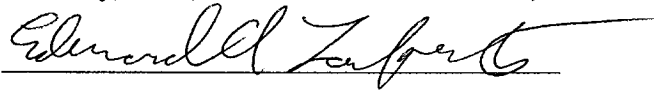
- a. Industrial Hygiene Sampling Data Sheets for Building 3415, collected 4 March 1993; 19 April 1993; 3 May 1993; 16 July 1993; and 21 July 1993; 22 July 1993;
 - b. Bulk Material Sampling Data Sheets for Building 3415, collected 13 June 1990 and 2 July 1993;
 - c. Bulk Material Sampling Data Sheet for Building 3416, collected 27 June 1984;
 - d. Bulk Material Sampling Data Sheet for Building 3426, collected 4 April 1997.
5. True and correct copies of all of the documents listed above, as they are kept in my office's files, have previously been provided to the Office of the Staff Judge Advocate, 15th Airlift Wing, Hickam Air Force Base.
6. Despite my specific inquiries and search efforts, several documents sought in the Discovery Request could not be located. The documents that could not be located include:
 - a. Asbestos surveys, bulk samplings, and asbestos abatement records regarding Building 3425;
 - b. Asbestos surveys, asbestos bulk samplings, and asbestos abatement records regarding Building 3427, *excluding*:
 - 1) Bulk Asbestos Sample No HIC93-345, Bldg 3427, 2nd Floor (Floor Tile)
 - 2) Memo from 154 GP/EMO to 15 CES/CEV re: Asbestos Sample Request, Bldg 3427, 2nd Floor.

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- c. Environmental Baseline Survey (EBS) Report for 203 ARS Facilities, Hickam AFB, dated November 1993.
- d. 15 CES/DEV Historical Environmental Reports, dated November 1993.
- e. ECAMP Program Report, dated October 1993
- f. ECAMP Program Report, dated 1992
- g. HIANG Asbestos Management Plan and Asbestos Survey, dated January 1992.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on this 7 day of February, 2006, at Hickam Air Force Base, Hawaii.

A handwritten signature in black ink, appearing to read "Edward A. Lafferty", is written over a horizontal line.

EDWARD A. LAFERTY, Maj, USAF, BSC

Bioenvironmental Engineering Flight Commander